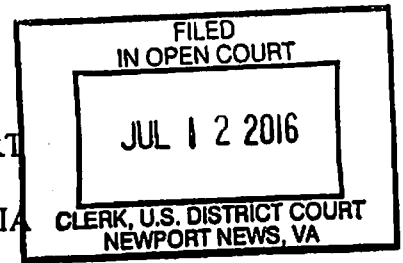


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA



Newport News Division

UNITED STATES OF AMERICA

v.

WILLIAM TYSON

Criminal No. 4:16CR

58
18 U.S.C. §2252A (a)(2)
Receipt of Child Pornography
(Counts 1-4)

18 U.S.C. § 924(d), 28 U.S.C.
§ 2461(c)
Forfeiture

INDICTMENT

July 2016 Term - At Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 13, 2016, in the Eastern District of Virginia, the defendant, WILLIAM TYSON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a movie entitled "vicky.mpg," depicting a female child engaging in sexually explicit conduct, specifically, actual and simulated oral-genital sexual intercourse by an adult male with a pre-pubescent female child, that that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 13, 2016, in the Eastern District of Virginia, the defendant, WILLIAM TYSON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a movie entitled “(bukake)(snuff) – suck cum inside mouth swallow (2).mpg,” depicting a female child engaging in sexually explicit conduct, specifically, actual and simulated oral-genital sexual intercourse by an adult male with a pre-pubescent minor female child, that that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 28, 2016, in the Eastern District of Virginia, the defendant, WILLIAM TYSON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a movie entitled “! new ! (pthc) veronika little sister bj and cum inside mouth - copia.wmv,” depicting a female child engaging in sexually explicit conduct, specifically, actual and simulated oral-genital sexual intercourse by an adult male with a pre-pubescent minor female child, that that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 28, 2016, in the Eastern District of Virginia, the defendant, WILLIAM TYSON, knowingly received material containing an image of child pornography as defined by 18 U.S.C. § 2256(8), to wit: a movie entitled "VID_20150718_034813.mp4," depicting a female child engaging in sexually explicit conduct, specifically, actual and simulated masturbation by an adult male with a pre-pubescent female child, that that had been mailed and using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1).)

FORFEITURE

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is hereby notified that, if convicted of any count in the Indictment, the defendant shall forfeit to the United States his interest in the following property:

a. any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

b. any and all property, real and personal, used or intended to be used in any manner or part to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property;

c. any and all property, real and personal, constituting, derived from, or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*; and

d. pursuant to 21 U.S.C. § 853(p), any other property of the defendant, up to the value of the property subject to forfeiture, if any property subject to forfeiture, as a result of any act or omission of the defendant (i) cannot be located upon the exercise of due diligence, (ii) has been transferred to, sold to, or deposited with a third party, (iii) has been placed beyond the jurisdiction of the Court, (iv) has been substantially diminished in value, or (v) has been commingled with other property that cannot be divided without difficulty.

2. The property subject to forfeiture under paragraph 1 includes, but is not limited to, the following:

- * Samsung camera, Model number SC-DC164
- * Samsung cell phone, Model Galaxy S2
- * Dell Inspiron laptop
- * Samsung cell phone, Model SGH-T759
- * Samsung cell phone, Model SGH-T589
- * Nikon Coolpix camera

(In accordance with Title 18, United States Code, Sections 2253).

UNITED STATES v. WILLIAM TYSON

Criminal No. : 4:16cr *58*

A TRUE BILL:

REDACTED COPY

DANA J. BOENTE
UNITED STATES ATTORNEY



Megan M. Cowles
Assistant United States Attorney